

**BEFORE THE
BOARD OF BEHAVIORAL SCIENCES
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**ALEXANDRA N. WALSH
3330 E. Foothill Blvd, Unit 331
Pasadena, CA 91107-3895**

**Associate Professional Clinical Counselor
Registration No. APCC 3857
Licensed Marriage and Family Therapist
License No. LMFT 122488**

Respondent.

Case No. 2002022001794

OAH No. 2022050610

DECISION AND ORDER

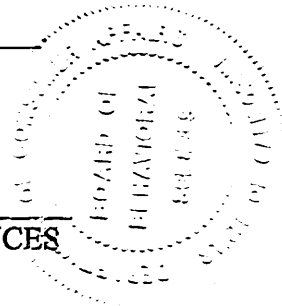
The attached Stipulated Surrender of Registration and License, and Order is hereby adopted by the Board of Behavioral Sciences, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on January 5, 2023

It is so ORDERED December 6, 2022.

Steve Sodergren

FOR THE BOARD OF BEHAVIORAL SCIENCES
DEPARTMENT OF CONSUMER AFFAIRS



1 ROB BONTA
Attorney General of California
2 ARMANDO ZAMBRANO
Supervising Deputy Attorney General
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Attorneys for Complainant
7

8 **BEFORE THE**
9 **BOARD OF BEHAVIORAL SCIENCES**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2002022001794

13 **ALEXANDRA N. WALSH**
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OAH No. 2022050610

14 **Associate Professional Clinical Counselor**
15 **Registration No. APCC 3857**
16 **Licensed Marriage and Family Therapist**
License No. LMFT 122488

**STIPULATED SURRENDER OF
REGISTRATION AND LICENSE, AND
ORDER**

17 Respondent.

18
19 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
20 entitled proceedings that the following matters are true:

21 **PARTIES**

22 1. Steve Sodergren (Complainant) is the Executive Officer of the Board of Behavioral
23 Sciences (Board). He brought this action solely in his official capacity and is represented in this
24 matter by Rob Bonta, Attorney General of the State of California, by Brian Lee, Deputy Attorney
25 General.

26 2. Alexandra N. Walsh (Respondent) is represented in this proceeding by attorney Joan
27 E. Trimble from the law firm of Callahan Thompson Sherman & Caudill, LLP, located at 2601
28 Main Street, Suite 800, Irvine CA 92614.

3. On or about April 4, 2017, the Board issued Associate Professional Clinical Counselor Registration No. APCC 3857 to Respondent. The Associate Professional Clinical Counselor Registration was in full force and effect at all times relevant to the charges brought in Accusation No. 2002022001794 and will expire on April 30, 2023, unless renewed.

4. On or about October 13, 2020, the Board issued Licensed Marriage and Family Therapist License No. LMFT 122488 to Respondent. The Licensed Marriage and Family Therapist License was in full force and effect at all times relevant to the charges brought in Accusation No. 2002022001794 and will expire on October 31, 2024, unless renewed.

JURISDICTION

5. Accusation No. 2002022001794 was filed before the Board, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on March 11, 2022. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. 2002022001794 is attached as Exhibit A and incorporated by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 2002022001794. Respondent also has carefully read, fully discussed with counsel, and understands the effects of this Stipulated Surrender of Registration and License, and Order.

7. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

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1 **CULPABILITY**

2 9. Respondent understands that the charges and allegations in Accusation No.
3 2002022001794, if proven at a hearing, constitute cause for imposing discipline upon her
4 Associate Professional Clinical Counselor Registration and her Licensed Marriage and Family
5 Therapist License.

6 10. For the purpose of resolving the Accusation without the expense and uncertainty of
7 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual
8 basis for the charges in the Accusation and that those charges constitute cause for discipline.
9 Respondent hereby gives up her right to contest that cause for discipline exists based on those
10 charges.

11 11. Respondent understands that by signing this stipulation she enables the Board to issue
12 an order accepting the surrender of her Associate Professional Clinical Counselor Registration
13 and Licensed Marriage and Family Therapist License without further process.

14 **CONTINGENCY**

15 12. This stipulation shall be subject to approval by the Board. Respondent understands
16 and agrees that counsel for Complainant and the staff of the Board may communicate directly
17 with the Board regarding this stipulation and surrender, without notice to or participation by
18 Respondent or her counsel. By signing the stipulation, Respondent understands and agrees that
19 she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board
20 considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order,
21 the Stipulated Surrender of Registration and License, and Order shall be of no force or effect,
22 except for this paragraph, it shall be inadmissible in any legal action between the parties, and the
23 Board shall not be disqualified from further action by having considered this matter.

24 13. The parties understand and agree that Portable Document Format (PDF) and facsimile
25 copies of this Stipulated Surrender of Registration and License, and Order, including PDF and
26 facsimile signatures thereto, shall have the same force and effect as the originals.

27 14. This Stipulated Surrender of Registration and License, and Order is intended by the
28 parties to be an integrated writing representing the complete, final, and exclusive embodiment of

1 their agreement. It supersedes any and all prior or contemporaneous agreements, understandings,
2 discussions, negotiations, and commitments (written or oral). This Stipulated Surrender of
3 Registration and License, and Order may not be altered, amended, modified, supplemented, or
4 otherwise changed except by a writing executed by an authorized representative of each of the
5 parties.

6 15. In consideration of the foregoing admissions and stipulations, the parties agree that
7 the Board may, without further notice or formal proceeding, issue and enter the following Order:

8 **ORDER**

9 IT IS HEREBY ORDERED that Associate Professional Clinical Counselor Registration
10 No. APCC 3857 and Licensed Marriage and Family Therapist License No. LMFT 122488 issued
11 to Respondent Alexandra N. Walsh, are surrendered and accepted by the Board.

12 1. The surrender of Respondent's Associate Professional Clinical Counselor Registration
13 and Licensed Marriage and Family Therapist License and the acceptance of the surrendered
14 registration and license by the Board shall constitute the imposition of discipline against
15 Respondent. This stipulation constitutes a record of the discipline and shall become a part of
16 Respondent's registration and license history with the Board.

17 2. Respondent shall lose all rights and privileges as an Associate Professional Clinical
18 Counselor and Licensed Marriage and Family Therapist in California as of the effective date of
19 the Board's Decision and Order.

20 3. Respondent shall cause to be delivered to the Board her registration, wall license(s)
21 and current renewal certificate(s) on or before the effective date of the Decision and Order.

22 4. Respondent further agrees that with the adoption by the Board of her registration and
23 license surrender, Respondent may not petition the Board for reinstatement of the surrendered
24 registration or license.

25 5. Respondent may reapply to the Board for licensure three years from the effective date
26 of surrender and must meet all current requirements for licensure including, but not limited, to
27 filing a current application, meeting all current educational and experience requirements, and
28 taking and passing any and all examinations required of new applicants.

1 6. Respondent shall pay the Board its costs of investigation and enforcement in the
2 amount of \$9,647.00 prior to the issuance of a new registration or license.

3 7. If Respondent should ever reapply for licensure as an Associate Professional Clinical
4 Counselor or a Licensed Marriage Family Therapist or should she ever apply for any other
5 registration or license issued by the Board, or by the Board of Psychology, all of the charges
6 contained in Accusation No. 2002022001794 shall be deemed admitted for the purpose of any
7 Statement of Issues or other proceeding seeking to deny such application or reapplication.

8 ACCEPTANCE

9 I have carefully read the above Stipulated Surrender of Registration and License, and Order
10 and have fully discussed it with my attorney. I understand the stipulation and the effect it will
11 have on my Associate Professional Clinical Counselor Registration, and Licensed Marriage and
12 Family Therapist License. I enter into this Stipulated Surrender of Registration and License, and
13 Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order
14 of the Board of Behavioral Sciences.

15
16
17 DATED: 11/21/2022


ALEXANDRA N. WALSH
Respondent

19
20 I have read and fully discussed with Respondent Alexandra N. Walsh the terms and
21 conditions and other matters contained in this Stipulated Surrender of Registration and License,
22 and Order. I approve its form and content.

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25 DATED: November 22, 2022


JOAN E. TRIMBLE
Attorney for Respondent

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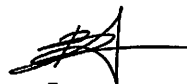
ENDORSEMENT

The foregoing Stipulated Surrender of Registration and License, and Order is hereby respectfully submitted for consideration by the Board of Behavioral Sciences of the Department of Consumer Affairs.

DATED: November 23, 2022

Respectfully submitted,

ROB BONTA
Attorney General of California
ARMANDO ZAMBRANO
Supervising Deputy Attorney General



BRIAN LEE
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 2002022001794

1 ROB BONTA
Attorney General of California
2 ARMANDO ZAMBRANO
Supervising Deputy Attorney General
3 BRIAN LEE
Deputy Attorney General
4 State Bar No. 253592
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E-mail: Brian.Lee@doj.ca.gov
7 *Attorneys for Complainant*

8
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BOARD OF BEHAVIORAL SCIENCES
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

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14 **3330 E. Foothill Blvd, Unit 331**
Pasadena, CA 91107-3895

ACCUSATION

15 **Associate Professional Clinical Counselor**
16 **Registration No. APCC 3857**
17 **Licensed Marriage and Family Therapist**
License No. LMFT 122488

18 Respondent.

19
20
21 **PARTIES**

22 1. Steve Sodergren (Complainant) brings this Accusation solely in his official capacity
23 as the Executive Officer of the Board of Behavioral Sciences, Department of Consumer Affairs.

24 2. On or about April 4, 2017, the Board of Behavioral Sciences issued Associate
25 Professional Clinical Counselor Registration Number APCC 3857 to Alexandra N. Walsh
26 (Respondent). The Associate Professional Clinical Counselor Registration was in full force and
27 effect at all times relevant to the charges brought herein and will expire on April 30, 2022, unless
28 renewed.

3. On or about October 13, 2020, the Board of Behavioral Sciences issued Licensed Marriage and Family Therapist License Number LMFT 122488 to Respondent. The Licensed Marriage and Family Therapist License was in full force and effect at all times relevant to the charges brought herein and will expire on October 31, 2022, unless renewed.

JURISDICTION

4. This Accusation is brought before the Board of Behavioral Sciences (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

5. Section 4990.33 states:

Notwithstanding any other law, except as provided in Section 4990.32, the expiration, cancellation, forfeiture, or suspension of a license, registration, or other authority to practice by operation of law or by order or decision of the board or a court of law, the placement of a license on a retired status, or the voluntary surrender of a license or registration by a licensee or registrant, of any license or registration within the authority of the board, shall not deprive the board of jurisdiction to commence or proceed with any investigation of, or action or disciplinary proceeding against, the licensee or registrant or to render a decision suspending or revoking the license or registration.

STATUTORY PROVISIONS

6. Section 4982 states, in pertinent part, as follows:

The board may deny a license or registration or may suspend or revoke the license or registration of a licensee or registrant if the licensee or registrant has been guilty of unprofessional conduct. Unprofessional conduct includes, but is not limited to, the following:

...

(b) Securing a license or registration by fraud, deceit, or misrepresentation on any application for licensure or registration submitted to the board, whether engaged in by an applicant for a license or registration, or by a licensee in support of any application for licensure or registration.

...

(e) Violating, attempting to violate, or conspiring to violate any of the provisions of this chapter or any regulation adopted by the board.

...

(g) Impersonation of another by any licensee, registrant, or applicant for a license or registration, or, in the case of a licensee, allowing any other person to use the licensee's or registrant's license or registration.

1 ...
2 (j) The commission of any dishonest, corrupt, or fraudulent act substantially
3 related to the qualifications, functions, or duties of a licensee or registrant.

4 ...
5 7. Section 4999.90 states, in pertinent part, as follows:

6 The board may refuse to issue any registration or license, or may suspend or
7 revoke the registration or license of any associate or licensed professional clinical
8 counselor, if the applicant, licensee, or registrant has been guilty of unprofessional
9 conduct. Unprofessional conduct includes, but is not limited to, the following:

10 ...
11 (b) Securing a license or registration by fraud, deceit, or misrepresentation on
12 any application for licensure or registration submitted to the board, whether engaged
13 in by an applicant for a license or registration, or by a licensee in support of any
14 application for licensure or registration.

15 ...
16 (e) Violating, attempting to violate, or conspiring to violate any of the
17 provisions of this chapter or any regulation adopted by the board.

18 ...
19 (g) Impersonation of another by any licensee, registrant, or applicant for a
20 license or registration, or, in the case of a licensee or registrant, allowing any other
21 person to use the licensee's or registrant's license or registration.

22 ...
23 (i) The commission of any dishonest, corrupt, or fraudulent act substantially
24 related to the qualifications, functions, or duties of a licensee or registrant.

25 ...
26 **REGULATORY PROVISIONS**

27 8. California Code of Regulations (CCR), title 16, section 1812 provides, in
28 pertinent part:

29 (a) For purposes of denial, suspension, or revocation of a license pursuant to
30 Section 141, Division 1.5 (commencing with Section 475), or Section 4982, Section
31 4989.54, Section 4992.3, or Section 4999.90 of the Code, a crime, professional
32 misconduct, or act shall be considered to be substantially related to the qualifications,
33 functions or duties of a person holding a license under Chapters 13, 13.5, 14, and 16
34 of Division 2 of the Code if to a substantial degree it evidences present or potential
35 unfitness of a person holding a license to perform the functions authorized by the
36 license in a manner consistent with the public health, safety or welfare. For purposes
37 of this section, "license" shall mean license or registration.

1 (c) For purposes of subsection (a), a substantially related crime, professional
misconduct, or act shall include, but is not limited to, the following:

2 (1) Any violation of Article 6, Chapter 1, Division 2 (commencing with section
3 650) of the Code.

4 (2) Any violation of the provisions of Chapter 13 (commencing with section
4980), Chapter 13.5 (commencing with section 4989.10), Chapter 13.7 (commencing
5 with section 4990), Chapter 14 (commencing with section 4991), or Chapter 16
(commencing with section 4999.10) of Division 2 of the Code.

6 **COST RECOVERY**

7 9. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
8 administrative law judge to direct a licensee found to have committed a violation or violations of
9 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
10 enforcement of the case. If a case settles, recovery of investigation and enforcement costs may be
11 included in a stipulated settlement.

12 **FACTUAL ALLEGATIONS**

13 10. On or about December 2, 2020, the Board received Respondent's application for
14 examination eligibility to become a Licensed Professional Clinical Counselor (LPCC). On
15 January 4, 2021, the Board sent Respondent a deficiency letter. To clear the deficiencies,
16 Respondent submitted six (6) Supervisory Plans. The Board's licensing evaluator was able to
17 contact supervisors G.F., R.P., S.D., M.C., and S.S.P. All five supervisors were sent copies of
18 the Supervisory Plans to verify signatures. All five supervisors denied signing the Supervisory
19 Plans submitted by Respondent.

20 11. On or about August 26, 2021, a Board analyst sent a letter to Respondent asking to
21 explain the signatures on the Supervisory Plans. On or about September 20, 2021, Respondent
22 responded through counsel and admitted that she had signed her supervisors' signatures herself.
23 Respondent claimed that she had not seen this particular form before and that she misunderstood
24 what the signature area was calling for. Respondent stated that she thought the form was simply
25 asking her to identify her supervisor.

26 12. On or about September 21, 2021, the Board's analyst emailed supervisors M.C.,
27 S.S.P., G.F., and S.D. to verify signatures on supervisory forms for when Respondent was in the
28 process of obtaining her Licensed Marriage and Family Therapist (LMFT) license. Initially,

1 supervisors M.C. S.S.P. and G.F. confirmed their signatures on the supervisory forms. However,
2 supervisor G.F. later confirmed that while she signed the "Responsibility Statement for
3 Supervisors "on May 4, 2017, the signature on the Experience Verification form, dated May 18,
4 2018, did not appear to be her signature.

5 13. Moreover, supervisor S.D. submitted a copy of the Experience Verification form she
6 signed on January 7, 2019. The form was different than the one Respondent submitted to the
7 Board as part of her LMFT Experience Verification. Respondent's submission was handwritten
8 and was completed on a form that was revised in January 2019. On the other hand, the copy from
9 supervisor S.D. was mostly typed and completed on a form that was revised in January 2018.
10 Although, the hours of experience logged were the same, the two forms also had different dates of
11 experience being claimed.

12 **FIRST CAUSE FOR DISCIPLINE**

13 **(Attempting to Secure a License by Deceit and/or Misrepresentation)**

14 14. Respondent's Licensed Marriage and Family Therapist license is subject to discipline,
15 Respondent is subject to disciplinary action under section 4982, subdivisions (b) and (e), for
16 unprofessional conduct in that Respondent submitted two Experience Verification forms with
17 forged supervisor signatures to obtain a LMFT license and five Supervisory Plans with forged
18 supervisor signatures as part of the application process to obtain an LPCC license. Complainant
19 refers to, and by this reference incorporates, the allegations set forth above in paragraphs 10
20 through 13 as though fully set forth herein.

21 **SECOND CAUSE FOR DISCIPLINE**

22 **(Impersonation of Another by a Licensee/Registrant)**

23 15. Respondent's Licensed Marriage and Family Therapist license is subject to discipline,
24 Respondent is subject to disciplinary action under section 4982, subdivision (g), for
25 unprofessional conduct in that Respondent submitted two Experience Verification forms with
26 forged supervisor signatures to obtain a LMFT license and five Supervisory Plans with forged
27 supervisor signatures as part of the application process to obtain an LPCC license. Complainant

28 ///

1 refers to, and by this reference incorporates, the allegations set forth above in paragraphs 10
2 through 13 as though fully set forth herein.

3 **THIRD CAUSE FOR DISCIPLINE**

4 **(Commission of a Dishonest Act)**

5 16. Respondent's Licensed Marriage and Family Therapist license is subject to discipline,
6 Respondent is subject to disciplinary action under section 4982, subdivision (j), for
7 unprofessional conduct in that Respondent submitted two Experience Verification forms with
8 forged supervisor signatures to obtain a LMFT license and five Supervisory Plans with forged
9 supervisor signatures as part of the application process to obtain an LPCC license. Complainant
10 refers to, and by this reference incorporates, the allegations set forth above in paragraphs 10
11 through 13 as though fully set forth herein.

12 **FOURTH CAUSE FOR DISCIPLINE**

13 **(Attempting to Secure a License by Deceit and/or Misrepresentation)**

14 17. Respondent's Associate Professional Clinical Counselor registration is subject to
15 discipline, Respondent is subject to disciplinary action under section 4999.90, subdivisions (b)
16 and (e), for unprofessional conduct in that Respondent submitted two Experience Verification
17 forms with forged supervisor signatures to obtain a LMFT license and five Supervisory Plans
18 with forged supervisor signatures as part of the application process to obtain an LPCC license.
19 Complainant refers to, and by this reference incorporates, the allegations set forth above in
20 paragraphs 10 through 13 as though fully set forth herein.

21 **FIFTH CAUSE FOR DISCIPLINE**

22 **(Impersonation of Another by a Licensee/Registrant)**

23 18. Respondent's Associate Professional Clinical Counselor registration is subject to
24 discipline, Respondent is subject to disciplinary action under section 4999.90 subdivision (g), for
25 unprofessional conduct in that Respondent submitted two Experience Verification forms with
26 forged supervisor signatures to obtain a LMFT license and five Supervisory Plans with forged
27 supervisor signatures as part of the application process to obtain an LPCC license. Complainant

28 ///

1 refers to, and by this reference incorporates, the allegations set forth above in paragraphs 10
2 through 13 as though fully set forth herein.

3 **SIXTH CAUSE FOR DISCIPLINE**

4 **(Commission of a Dishonest Act)**

5 19. Respondent's Associate Professional Clinical Counselor registration is subject to
6 discipline, Respondent is subject to disciplinary action under section 4999.90, subdivision (j), for
7 unprofessional conduct in that Respondent submitted two Experience Verification forms with
8 forged supervisor signatures to obtain a LMFT license and five Supervisory Plans with forged
9 supervisor signatures as part of the application process to obtain an LPCC license. Complainant
10 refers to, and by this reference incorporates, the allegations set forth above in paragraphs 10
11 through 13 as though fully set forth herein.

12 **PRAYER**

13 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
14 and that following the hearing, the Board of Behavioral Sciences issue a decision:

- 15 1. Revoking or suspending Associate Professional Clinical Counselor Registration
16 Number APCC 3857, issued to Alexandra N. Walsh;
- 17 2. Revoking or suspending Licensed Marriage and Family Therapist License Number
18 LMFT 122488, issued to Alexandra N. Walsh;
- 19 3. Ordering Alexandra N. Walsh to pay the Board of Behavioral Sciences the reasonable
20 costs of the investigation and enforcement of this case, pursuant to Business and Professions
21 Code section 125.3; and,

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4. Taking such other and further action as deemed necessary and proper.

DATED: March 1, 2022

Steve Sodergren

STEVE SODERGREN
Executive Officer
Board of Behavioral Sciences
Department of Consumer Affairs
State of California
Complainant

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